



## U.S. Environmental Protection Agency Applicability Determination Index

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**Control Number: C59**

**Category:** Asbestos  
**EPA Office:** SSCD  
**Date:** 01/24/1989  
**Title:** Chutes for Handling Asbestos  
**Recipient:** Schwieger, Robert G.  
**Author:** Malmberg, Kenneth B.

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**Subparts:** Part 61, M, Asbestos

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**References:** 61.145(c)

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**Abstract:**

If asbestos-containing material is removed or stripped more than 50 feet above ground level, it must be transported to the ground via dust-tight chutes or containers (Section 61.147 (e)(3)) (Section 61.145(c) 1990 regulations).

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**Letter:**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460  
JAN 24 1989

Robert G. Schwieger  
Editorial Director  
Power  
11 West 19th Street  
New York, N.Y. 10011

Dear Mr. Schwieger:

I recently read your October, 1988 issue, including the article beginning on page 37, "Replacing Asbestos Fill in Cooling Towers - Safely, Quickly," by William Wurtz. I am concerned about the suggestion contained several times in that article, to "let the pieces fall to the basin," after removal of asbestos cement sheets from locations hundreds of feet off the ground.

As you know, The Clean Air Act regulates asbestos under Section 112, National Emission Standards for Hazardous Air pollutants. Regulations implementing that legislation are contained in 40 CFR 61 Subpart M.

My concern is with compliance with renovation requirements contained in Section 61.147 (e)(2), which requires the owner or operator of a facility to carefully lower friable asbestos materials to the ground; not dropping or throwing them.

If the asbestos containing material is removed or stripped more than 50 feet above ground level, it must be transported to the ground via dust-tight chutes or containers (Sect 61.147 (e)(3)).

I hope your readers are not misled about compliance with these important asbestos requirements. I was encouraged by your editorial statement on page 4 that "Preserving the environment is a necessary adjunct to any steam or electric-power-generation projects."

Thank you for this opportunity to clarify EPA requirements.

Sincerely,

Kenneth B. Malmberg, Environmental Specialist  
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